

EXHIBIT 31

TRIAL DAY 19, AUGUST 24, 2018 PM SESSION

WEIRICK, et al. vs. BRENNTAG NORTH AMERICA, INC., et al.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT NE-P

HON. MARGARET L. OLDENDORF, JUDGE

CAROLYN WEIRICK, ET AL.,)
PLAINTIFFS,) CASE NO. BC656425
VS.)
BRENNTAG NORTH AMERICA, INC., ET)
AL.,)
DEFENDANTS.)
_____)

Certified Transcript

TRIAL DAY 19 - P.M. SESSION

REPORTER'S TRANSCRIPT OF PROCEEDINGS

AUGUST 24, 2018

APPEARANCES:

FOR THE PLAINTIFFS: SIMON GREENSTONE PANATIER
BY: JAY STUEMKE, ESQ.
1201 ELM STREET, SUITE 3400
DALLAS, TEXAS 75270

SIMON GREENSTONE PANATIER
BY: JORDAN BLUMENFELD-JAMES, ESQ.
3780 KILROY AIRPORT WAY, SUITE 540
LONG BEACH, CALIFORNIA 90806

(APPEARANCES CONTINUED NEXT PAGE)

REPORTED BY: DEBORAH MORIN, CSR NO. 11558
OFFICIAL REPORTER PRO TEMPORE

1 Q AND YOU SELECTED HIM?

2 A YES, SIR, I DID.

3 Q AND HE USED PLM?

4 A THAT'S WHY I HIRED HIM TO DO THAT, TO USE PLM
5 AND XRD. SO I WOULD HOPE HE WOULD DO THAT BECAUSE THAT
6 WAS THE INSTRUCTIONS, AND HE DID DO IT.

7 Q AND HE DIDN'T FIND ANY ASBESTOS IN

8 MS. WEIRICK'S SAMPLE; CORRECT?

9 A NOT USING THE R-93 EPA METHOD OR THE XRD, NO.
10 THAT'S THE PROBLEM WITH IT, OF COURSE.

11 Q AND IT'S TRUE, ISN'T IT, THAT YOU --

12 MOTION TO STRIKE AFTER "NO."

13 THE COURT: OVERRULED.

14 BY MR. PARKER:

15 Q ISN'T IT TRUE -- WELL, LET ME JUST SAY THIS.

16 IS IT YOUR OPINION THAT IF YOU USE THE PLM
17 METHOD, YOU CANNOT FIND IN MS. WEIRICK'S SAMPLE ANY
18 AMPHIBOLES AT ALL?

19 A THE R-93 METHOD YOU WILL NOT FIND IT, NO.

20 Q ISN'T IT TRUE, SIR, THAT THE REASON YOU DID
21 NOT WANT TO USE THE PLM METHOD IS YOUR RELIANCE ON
22 BLOUNT DESPITE DR. MILLETTE'S ARTICLE OF LEE POYE'S USE
23 BECAUSE YOU KNEW YOU WERE NOT GOING TO FIND ASBESTOS IN
24 MS. WEIRICK'S BOTTLE?

25 A NO. WE DIDN'T KNOW ANYTHING UNTIL WE DID THE
26 TEM ANALYSIS. AFTER WE SAW THE TEM ANALYSIS, WE KNOW
27 THOSE CONCENTRATIONS. THE PLM METHOD IS NOT APPROPRIATE
28 TO DO AN EVALUATION FOR THESE TYPES OF PRODUCTS.

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 FOR THE COUNTY OF LOS ANGELES
3 DEPARTMENT NE-P HON. MARGARET L. OLDENDORF, JUDGE
4
5 CAROLYN WEIRICK, ET AL.,)
6 PLAINTIFFS,) CASE NO. BC656425
7 VS.)
8 BRENNTAG NORTH AMERICA, INC., ET)
9 AL.,)
10 DEFENDANTS.)
11 _____)
12
13
14 I, DEBORAH MORIN, CSR NO. 11558, OFFICIAL REPORTER
15 PRO TEMPORE OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA,
16 FOR THE COUNTY OF LOS ANGELES, DO HEREBY CERTIFY THAT THE
17 FOREGOING PAGES, 2861 THROUGH 2967, COMPRISE A FULL, TRUE AND
18 CORRECT TRANSCRIPT OF THE PROCEEDINGS AND TESTIMONY TAKEN IN
19 THE ABOVE-ENTITLED CAUSE ON AUGUST 24, 2018.
20
21 DATED THIS 25TH DAY OF AUGUST, 2018.

22 *Deborah Morin*, CSR NO. 11558
23 _____
24 DEBORAH MORIN, OFFICIAL REPORTER
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